

1 David Martinez (SBN 193183)
2 DMartinez@rkmc.com
3 **ROBINS, KAPLAN, MILLER & CIRESI L.L.P.**
4 2049 Century Park East, Suite 3400
5 Los Angeles, CA 90067-3208
6 Telephone: 310.552.0130
7 Facsimile: 310.229.5800
8 Attorneys for Plaintiff and Counterclaim
9 Defendant TALON RESEARCH, LLC.

Ryan C. Nier (SBN 243876)
ryannier@paulhastings.com
PAUL HASTINGS LLP
55 Second Street
Twenty-Fourth Floor
San Francisco, CA 94105
Telephone: 415.856.7226
Facsimile: 415.856.7100

Attorneys for Defendants and Counterclaim
Plaintiffs TOSHIBA AMERICA ELECTRONIC
COMPONENTS, INC.; and TOSHIBA
CORPORATION

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **OAKLAND DIVISION**

12 TALON RESEARCH, LLC,
13
14 Plaintiff/Counterclaim
15 Defendant,

16 v.

17 TOSHIBA AMERICA ELECTRONIC
18 COMPONENTS, INC.; TOSHIBA
19 CORPORATION,

20 Defendants/Counterclaim
21 Plaintiffs.

Case No. 11-04819 CW

**STIPULATED MOTION FOR DISMISSAL
WITH PREJUDICE AND ~~PROPOSED~~
ORDER OF DISMISSAL WITH PREJUDICE**

22
23 The Plaintiff Talon Research, LLC and Defendants Toshiba America Electronic
24 Components, Inc. and Toshiba Corporation, pursuant to Fed. R. Civ. P. 41(a)(2) and (c), hereby
25 move for an order dismissing all claims and counterclaims in this action WITH PREJUDICE,
26 with each party to bear its own costs, expenses and attorneys' fees.

1
2 /s/ David Martinez
3 David Martinez, (SBN 193183)
4 DMartinez@rkmc.com
5 **ROBINS, KAPLAN, MILLER & CIRESI L.L.P.**
6 2049 Century Park East, Suite 3400
7 Los Angeles, CA 90067-3208
8 Telephone: 310.552.0130
9 Facsimile: 310.229.5800

/s/ Ryan C. Nier
Ryan C. Nier (SBN 243876)
ryannier@paulhastings.com
PAUL HASTINGS LLP
55 Second Street
Twenty-Fourth Floor
San Francisco, CA 94105
Telephone: 415.856.7226
Facsimile: 415.856.7100

10
11
12 **ATTESTATION**

13 In accord with the Northern District of California's General Order No. 45, Section X(B), I
14 attest that concurrence in the filing of this document has been obtained from each of the other
15 signatories who are listed on the signature pages. I will maintain an executed copy of this
16 stipulation in our files that can be made available for inspection upon request.

17 **~~PROPOSED~~ ORDER**

18 NOW THEREFORE, IT IS SO ORDERED.

19 Dated: April 12, 2013

20
21
22
23
24
25
26
27
28

Hon. CLAUDIA WILKEN
UNITED STATES DISTRICT COURT JUDGE